CALLARI PARTNERS LLC

Carollynn H.G. Callari Russell D. Morris One Rockefeller Plaza, 10th Floor New York, NY 10020

Telephone: 212.202.3055 Facsimile: 732.243.0163

Email: ccallari@callaripartners.com

rmorris@callaripartners.com

Co-Counsel for Jose Antonio Cañedo-White, Carlos Williamson-Nasi, Gonzalo Gil- White, and Miguel Angel Villegas-Vargas

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

PERFORADORA ORO NEGRO, S. DE R.L. DE C.V., et al.

Debtors in a Foreign Proceeding.

FERNANDO PEREZ-CORREA IN HIS CAPACITY AS FOREIGN REPRESENTATIVE OF PERFORADORA ORO NEGRO, S. DE R.L. DE C.V.; JOSE ANTONIO CAÑEDO-WHITE; CARLOS WILLIAMSON-NASI; GONZALO GIL-WHITE; AND MIGUEL ÁNGEL VILLEGAS-VARGAS

Plaintiffs,

-against-

ASIA RESEARCH AND CAPITAL
MANAGEMENT LTD.; GHL INVESTMENTS
(EUROPE) LTD.; ORO NEGRO PRIMUS PTE.,
LTD.; ORO NEGRO LAURUS PTE., LTD.;
ORO NEGRO FORTIUS PTE., LTD.; ORO
NEGRO DECUS PTE., LTD.; ORO NEGRO
IMPETUS. PTE., LTD.; SHIP FINANCE
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

Chapter 15

Case No. 18-11094 (SCC)

Adv. Pro. No. 19-01360 (SCC)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Carollynn H.G. Callari and Russell D. Morris of the law firm of Callari Partner LLC and of the Bar of this Court hereby enter their appearance in the above-captioned proceeding (the "Adversary Proceeding") as co-counsel for Jose Antonio Cañedo-White, Carlos Williamson-Nasi, Gonzalo Gil- White, and Miguel Angel Villegas-Vargas, and request, pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code"), that copies of all notices, documents, papers and pleadings in the Adversary Proceeding be given and served upon:

CALLARI PARTNERS LLC

Carollynn H.G. Callari Russell D. Morris One Rockefeller Plaza, 10th Floor New York, NY 10020

Telephone: 212.202.3055 Facsimile: 732.243.0163

Email: <u>ccallari@callaripartners.com</u> rmorris@callaripartners.com

PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Code section 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, facsimile transmission, e-mail or otherwise filed or made with respect to the Adversary Proceeding.

19-01360-scc Doc 23 Filed 02/25/21 Entered 02/25/21 02:44:46 Main Document Pg 3 of 4

PLEASE TAKE FURTHER NOTICE that neither this request for notice and service nor any later appearance, pleading, claim, or suit is a waiver of any substantive or procedural right. Nor shall this request be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: February 24, 2021

New York, New York

/s/ Carollynn H.G. Callari

Carollynn H.G. Callari

CALLARI PARTNERS LLC

One Rockefeller Plaza, 10th Floor New York, NY 10020

Telephone: 212.202.3055 Facsimile: 732.243.0163

Email: ccallari@callaripartners.com

Co-Counsel for Jose Antonio Cañedo-White, Carlos Williamson-Nasi, Gonzalo Gil-White, and Miguel Angel Villegas-Vargas 19-01360-scc Doc 23 Filed 02/25/21 Entered 02/25/21 02:44:46 Main Document Pg 4 of 4

CERTIFICATE OF SERVICE

I, Carollynn H.G. Callari, hereby certify that on February 25, 2021, I caused a copy of the annexed Notice of Appearance and Request for Documents to be filed and served through ECF notification upon all parties who receive notice in this matter pursuant to the Court's ECF filing system.

/s/ Carollynn H.G. Callari
Carollynn H.G. Callari